

UNITED STATES DISTRICT COURT
for the
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION
Docket No. 1:09 CR 54

UNITED STATES OF AMERICA

vs.

THOMAS BRADFORD NORVELL

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)
)

DEFENDANT'S EMERGENCY MOTION
FOR REDUCTION OF SENTENCE
PURSUANT TO 18 U.S.C. §3582(c)(COMPASSIONATE RELEASE)

COMES NOW THE defendant, Thomas Bradford Norvell, through undersigned counsel, to move this Court for immediate conversion of the unserved balance of his term of incarceration to home confinement due to the uncontrolled spread of COVID-19 at Federal Correctional Institution Butner Low, where he is serving the sentence imposed by this Court. In support of this motion, the Defendant shows unto the Court that:

- 1, Title 18 United States Code §3582(c)(1)(A)(I) permits a sentencing court to reduce a previously imposed term of imprisonment and to substitute a term of supervised release if the court finds that “extraordinary and compelling reasons warrant such a reduction”.
2. The rapid spread of COVID-19 disease within the Butner Complex of the BOP provide a number of “extraordinary and compelling reasons” for the conversion of the unserved portion of Mr. Norvell’s sentence to a sentence of home confinement with whatever conditions the Court deems appropriate.

3. Defendant's Brief In Support of Emergency Motion for Reduction of Sentence Pursuant to 18 U.S.C. §3582(c)(COMPASSIONATE RELEASE) is filed herewith.
4. The Defendant waives his presence at any hearing of this motion.
5. Counsel for the Defendant has consulted with government counsel. The likelihood is that the government will oppose this motion.

Respectfully submitted this 18th day of June, 2020.

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By: /s/ Sean P. Devereux
Sean P. Devereux
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CERTIFICATE OF SERVICE

I certify that all participants in this case are registered ECF users and that service will be accomplished through the ECF system. I certify that the foregoing document was served on the United States Attorney's office by service through the ECF system to the addressee below.

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/S/ Sean P. Devereux
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